

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

DAVID SAMBRANO, individually, and  
on behalf of all others similarly situated,

Plaintiffs,

v.

UNITED AIRLINES, INC.,

Defendant.

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Civil Action No.

4:21-CV-01074-P

**SUPPLEMENTAL APPENDIX IN SUPPORT OF DEFENDANT'S  
AMENDED MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

NOW COMES, Defendant United Airlines, Inc. and files this Supplemental Appendix in Support of Its Amended Motion to Compel Production of Documents.

<b><u>EXHIBIT</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>APP NO.</u></b>
A	Email from Kim Hamilton dated August 11, 2021	Supp. App. 1
B	Email string from Senator Ted Cruz to Kim Hamilton dated November 16, 2021	Supp. App. 2 - 3
C	Email from Steve Kirsch's Newsletter to Kim Hamilton dated April 24, 2023	Supp. App. 4 - 10

Respectfully submitted,

/s/ Russell D. Cawyer

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**ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via e-mail to all counsel of record this 19th day of June, 2023:

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/s/ Russell D. Cawyer  
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**From:** Kim Hamilton <kim@jimhamilton.net>

**Date:** August 11, 2021 at 07:52:52 CDT

**To:** Hamilton Kimberly <Kim@jimhamilton.net>

**Subject: A Large Percentage of Deaths Have Been Linked to the COVID-19 Vaccine, According to a German Pathologist - The True Defender !**

<https://thetruedefender.com/a-large-percentage-of-deaths-have-been-linked-to-the-covid-19-vaccine-according-to-a-german-pathologist/>

Kimberly Hamilton us



Message

**From:** Kim Hamilton [kim@jimhamilton.net]  
**on behalf of** Kim Hamilton <kim@jimhamilton.net> [kim@jimhamilton.net]  
**Sent:** 4/25/2023 4:40:40 PM  
**To:** salvare1@protonmail.com  
**Subject:** Fwd: Ted Cruz Responding to your message

Begin forwarded message:

**From:** Kim Hamilton <kim@jimhamilton.net>  
**Subject:** Fwd: Ted Cruz Responding to your message  
**Date:** April 25, 2023 at 10:06:00 AM CDT  
**To:** [salvare1@protonmail.com](mailto:salvare1@protonmail.com)

Begin forwarded message:

**From:** "Office of Senator Ted Cruz" <[noreply@cruz.senate.gov](mailto:noreply@cruz.senate.gov)>  
**Subject:** Responding to your message  
**Date:** November 16, 2021 at 12:28:02 PM CST  
**To:** [kim@jimhamilton.net](mailto:kim@jimhamilton.net)

**United States Senate**  
Washington, DC 20510

November 16, 2021

Dear Mrs. Hamilton,

Thank you for contacting me regarding concerns about COVID-19 vaccines and vaccine mandates. Input from fellow Texans significantly informs my decision-making and empowers me to better represent the state.

Recently, President Biden and his Administration has announced several COVID-19 vaccine mandates that threaten people's jobs, their livelihoods, and their ability to participate in everyday life and conduct their businesses as they see fit. Getting the vaccine is a personal choice, one that I made for myself, but Americans have the right to exercise personal choice when it comes to their own health. Getting the vaccine is a decision to be made in consultation with one's doctor, not one forced on Americans by the government. Furthermore, the Federal government has no legal or constitutional authority to force businesses in Texas, or across the country, to mandate that their employees get vaccinated.

I am opposed to President's Biden's COVID-19 vaccine mandates – mandates which will result in Americans losing their jobs for choosing not to get the vaccine. Texans and Americans have expressed their concerns with taking the vaccine, while many others have already recovered from COVID-19 and now have natural immunity. Regardless of one's reason, the Federal government has no business mandating vaccines. That is why I have introduced a number of bills that would prohibit the Federal government from mandating the vaccine on any Americans.



SUPP. APP. 2

SAMB0000719

One of the bills I have introduced, the No Vaccine Passports Act (S. 1932), would prohibit the federal government from establishing COVID-19 passports and from working with third parties to establish private vaccine passports. Another, the No Vaccine Mandates Act (S. 2686) would prohibit the government from establishing any COVID-19 mandate that forces someone to get the vaccine, prohibiting the administration of a vaccine without an individual's informed consent. Additionally, I have introduced the Parental Rights Protection Act (S. 3184) to prohibit the Federal government and school districts from mandating COVID-19 vaccines for children and vaccinating a child without parental consent.

The various bills I have introduced recognize that Americans have legitimate reasons for foregoing the vaccine, reasons such as underlying health conditions or having acquired natural immunity after recovering from COVID-19. My bills would prohibit discrimination based on vaccination status, protect individuals from having mandates forced upon them, and preserve the right of parents to make healthcare decisions for their children. Simply put, people should not be denied the opportunity to earn a living, access aspects of everyday life, go to school, or participate in society merely because they exercise their right to not receive this vaccine.

I continue to remain opposed to all COVID-19 mandates that unacceptably threaten the freedom and individual liberties of Americans. I believe that there should be no federal COVID mandates of any kind. The American people must keep their individual liberties and the right to make their own medical decisions.

Thank you again for sharing your views with me. Please feel free to contact me in the future about any issue important to you or your family. It is an honor to serve you and the people of Texas.

For Liberty,



Ted Cruz  
United States Senator

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Message

**From:** Kimberly Hamilton [kim@jimhamilton.net]  
**on behalf of** Kimberly Hamilton <kim@jimhamilton.net> [kim@jimhamilton.net]  
**Sent:** 4/24/2023 10:05:10 PM  
**To:** salvare1@protonmail.com  
**Subject:** Fwd: The COVID vaccine causes tinnitus and many other adverse events: there is no doubt about this

Kimberly Hamilton us

Begin forwarded message:

**From:** Steve Kirsch's newsletter <stevekirsch@substack.com>  
**Date:** April 24, 2023 at 15:37:28 CDT  
**To:** kim@jimhamilton.net  
**Subject:** The COVID vaccine causes tinnitus and many other adverse events: there is no doubt about this  
**Reply-To:** Steve Kirsch's newsletter  
<reply+1xnjqd&1pxnkc&&a9e3eee36fc875c99cbfcc6a0b1db8f6c8856cf569cfae5e02e9f05fe9fedad8@mg1.substack.com>

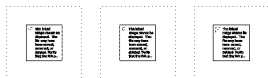
[Open in app or online](#)

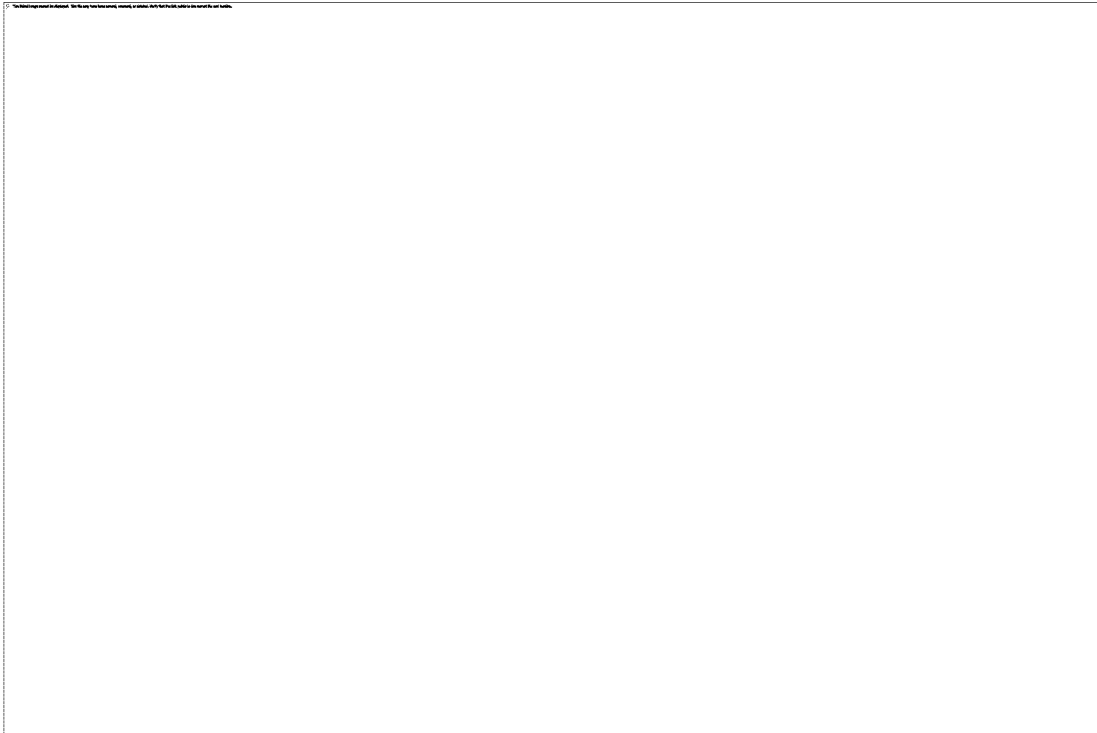
# The COVID vaccine causes tinnitus and many other adverse events: there is no doubt about this

The CDC is lying to the American people (again). They are either corrupt or incompetent or both. But nobody is asking any questions.

STEVE KIRSCH

APR 24





## **Executive summary**

This NBC News article says that even though many people have reported tinnitus following vaccination, the CDC has thoroughly investigated this and found no link.

In short, according to the CDC, these are just “coincidences” where people are vaccinated just before they develop tinnitus.

That’s not what I found when I looked at VAERS just now. 95% of the tinnitus reports from the 30 year history of VAERS were from just one vaccine: the COVID vaccine.

For atrial fibrillation, 93% of all VAERS reports are from the COVID vaccines.

For death, a safety signal was triggered less than a month after the vaccines rolled out.

The CDC is ignoring all these safety signals and more.

They are a corrupt organization and nobody is lifting a finger to investigate why they ignored these safety signals (including death). They all trust the CDC.

## **Introduction**



There is a new paper, Prevalence of New-Onset Tinnitus after COVID-19 Vaccination with Comparison to Other Vaccinations, which showed that you are twice as likely to get tinnitus after the flu shot, Tdap vaccine, and pneumococcal vaccine compared to the first shot of the COVID vaccine. It concluded that there's no reason to avoid the COVID vaccine.

A simple search of VAERS that I did just now shows that the COVID vaccine is causing tinnitus in 25,948 out of 27,295 cases reported to VAERS over the last 30 years. So in just over two years, **95% of all tinnitus reports are from the COVID vaccine.**

Sorry, but that's not a coincidence.

By comparison, the pneumococcal vaccine had only 136 cases, even though **the paper said it is twice as likely to get tinnitus** from that vaccine. That vaccine has been given for more than 30 years. The CDC recommends pneumococcal vaccination **for all children younger than 5 years old and all adults 65 years or older**. So almost everyone got it either as a kid or as an adult. Yet there are just 136 tinnitus cases.

Do you see a problem here?

## **What the VAERS reports say**

Here are five reports from the first six returned by the query that returned 25,948. You get the picture. The symptom develops right after the shot.

### **VAERS ID: 902832**

**Within an hour and a half of receiving developed tinnitus in both ears** lasting 6 hours

### **VAERS ID: 903094**

**40 min after shot** experienced dizziness, feeling like was going to pass out, not coherent, BP high, fast heart rate, light headed. Got chills, freezing cold, shivering, and later in the day **my ears were ringing**. Extremely fatigued.

### **VAERS ID: 903344**

severe, acute hearing loss and **tinnitus in R ear**.

### **VAERS ID: 903469**

**12 hours after getting the vaccine** blurry vision, **ringing ears**, headache, benadryl, steroid, claritin all oral

VAERS ID: 904050

10/17/2020 after the injection on Thursday I had a sore body, sore throat **ringing ears** joint pain,...  
Fri I woke up with sore throat every time I take a breath I have chest pain sore body **ringing in ears**, chills and I went to the ER

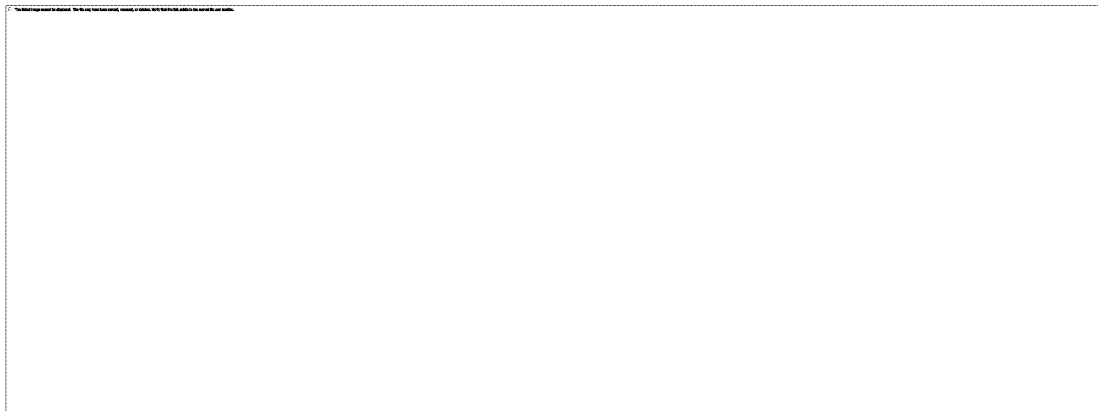
## **Tinnitus was acknowledged by the CDC as triggering a safety signal for the COVID vaccine**

From the data released by the CDC under FOIA, tinnitus generated a safety signal.

Here's an explanation of the safety signal algorithm used by the CDC.

One of the CDC criteria required to generate a safety signal is chi-squared  $> 4$  to trigger a safety signal.

The value for chi-squared for tinnitus was 2,627 which is indeed  $>4$  (by a long shot). What this means is that it's very unlikely this rule was triggered by pure chance.



## **Atrial fibrillation**

A friend of mine developed afib after he got his COVID shot. He didn't associate it with the shot.  
Here's the VAERS search on afib:



The # of cases listed at the top is the total number of VAERS reports found. The count inside the table is the number of times that vaccine was listed in a report. Because reports can have multiple vaccines listed, the sum of the counts can be greater than the number of cases.

So I did a search for COVID to find the number of afib cases associated with COVID: 8806. So  $8806/9427=93.4\%$  **of VAERS reports with afib are associated with the COVID vaccine.**

So again, this isn't likely to happen "by chance" that this one vaccine in just a little over two years **has triggered 93% of the afib reports in VAERS.**

I also know from a personal anecdote of a top UCSF doctor who got afib right after his vax, had surgery to correct it, was symptom free, got the second shot and immediately developed afib again.

That's known as "re-challenge" (same drug elicits same adverse reaction in the same patient longitudinally) and it is used to assess causality when this is seen with multiple patients.

Yet atrial fibrillation didn't even trigger a "safety signal" in the CDC report. Stunning.

## Summary

There is no question that the COVID vaccines cause tinnitus, afib, and many many more serious adverse events. You can see a relatively complete list here.

Not only are 95% of the reports of tinnitus in VAERS associated with the COVID vaccine, but randomly sampling the individual case reports show that the ringing started right after the shot.

So once again, the CDC is lying to the American public about adverse events caused by the COVID vaccine.

The most serious adverse event, of course, is death. The CDC safety signal for death triggered less than a month after the vaccines rolled out. It was the CDC's responsibility to investigate that safety signal.

Did they do that? Absolutely not.

There are a dispositive set of specialized tests that can exonerate or implicate the vaccine in a death after vaccination. This is the **ONLY** way you can make the assessment. The CDC has never performed any of these tests on anyone who died. **They are corrupt and the people involved should be held criminally negligent for not investigating any of these deaths.** They basically do not want to know whether the vaccines are at fault. When people die, they just look the other way.

Congress continues to look the other way as well while people are killed and injured by these vaccines. There are no questions being asked, and no hearings being held. They are just letting people die.



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